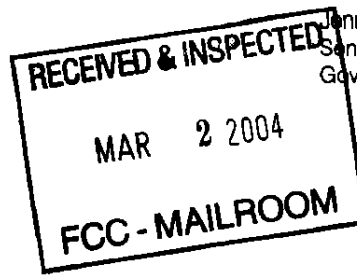




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February 27, 2004

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S W , TW - 325  
Washington, DC 20554

RE: Maritel Sharing Proposal (DA 04-378)  
(RM-10821)

~~XXXXXX~~

RM-10821

Dear Sir or Madam

The American Waterways Operators (AWO) is the national trade association representing the inland and coastal tugboat, towboat and barge industry. AWO's members own and operate 80 percent of the U S -flag fleet of towing vessels and barges and make up the majority of commercial vessels transiting the ports, coastal areas and waterways affected by the Coast Guard rulemaking on automatic identification systems (AIS). AWO has been a proponent of AIS as a navigational safety tool for some time. However, we have questioned the value of AIS as a security tool, as detailed in comments to the Coast Guard on December 31, 2003 in docket USCG-2003-14878. The Maritel Sharing Proposal for the necessary VHF channels raises serious additional concerns about the value and benefits of AIS.

AWO's specific concern about the Maritel Sharing Proposal centers on the value of AIS as a navigation safety tool. Maritel's request to limit the use of Channels 87B and 88B "to support Vessel Traffic Systems (VTS) and surveillance applications for homeland security that are consistent with the Maritime Transportation Security Act of 2002 [MTSA]" would effectively render AIS unusable as a navigation safety tool. The towing industry has supported AIS requirements (despite our reservations about their security benefits) based on the assumption that AIS equipment could also be used to enhance navigation safety. AWO members have long envisioned AIS as a tool used by mariners to identify other vessels and avoid vessel casualties. AWO believes that navigation safety is the key benefit of AIS and that without access to the VHF frequencies for that purpose, AIS would be a security tool only of very limited value.

As a result, AWO urges the FCC to reject the Maritel Sharing Proposal for VHF Channels 87B and 88B. We appreciate the opportunity to comment on this important issue and would be pleased to provide any additional information.

Sincerely,

*Jennifer A. Carpenter*

Jennifer A. Carpenter

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